

September 28, 1970

PP #121039. (HCN) Codex Alimentarius International Tolerances.

Memo Mr. Frank McFarland, OC, BF-320

From: Mr. J. G. Cummings, Chief  
Petitions Evaluation Branch, DPCT

(1) We had previously reviewed the proposed Codex tolerances for HCN, inorganic bromide, and malathion in raw cereals (memo 7/9/70, Cummings, Cook) and pointed out that all were compatible with U. S. tolerances except HCN in grain and flour and inorganic bromide in popcorn.

(2) Dr. Fitzhugh's memorandum of 7/23/70 states that (a) popcorn is not included in the Codex definition of raw cereals, and (b) that the discrepancy between the 125 ppm U. S. tolerance and 6 ppm Codex tolerance in flour is not applicable in that the U. S. tolerance is to cover direct fumigation of flour whereas the Codex tolerance in flour is to cover treatment of grain. Presumably flour treated in the holds of ships would require aeration to reduce residues to 6 ppm or less before entry into European ports.

(3) The only remaining discrepancy therefore is the 100 ppm U. S. tolerance for HCN in grains vs the 75 ppm Codex tolerance. Dr. Fitzhugh recommends that the 100 ppm U. S. tolerance be reduced to 75 ppm. We concur in this recommendation.

#### Rationale

The 100 ppm tolerance derives from PP #195 filed in 1959. In this petition a 75 ppm tolerance was originally proposed to cover residues in grains fumigated in warehouses with HCN liquid or discoids at the rate of 2-4 lbs act/1000 cu ft. The conclusions derived from the FDA evaluation of the residue data led to a request that the tolerance be established at 100 ppm rather than 75 ppm. The actual tolerance level however, is not directly related to human safety in that it was recognized that the normal aeration, turning of the grain in transfer, milling, baking, and finally cooking would assure essentially no residue at time of consumption of cereal products. The tolerance selected was primarily as a means of regulating the use at point of treatment. In the 10 years the tolerance has been in effect, I know of no instance of regulatory action on grains fumigated with HCN. Therefore, I would concur in the reduction of the present 100 ppm tolerance (120.130) to 75 ppm.

J. G. Cummings  
Petitions Evaluation Branch  
Division of Pesticide Chemistry and Toxicology

cc:  
BF-148      BF-200      BF-216  
BF-210      BF-110      International File

JGCummings:mcc  
9/28/70

BF-216

UNITED STATES DEPARTMENT OF AGRICULTURE  
AGRICULTURAL RESEARCH SERVICE  
PESTICIDES REGULATION DIVISION  
WASHINGTON, D. C. 20250

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*C. Williams*  
*Beane*  
*Shoof*  
*File: pp # 1E1*

Subject: Pesticide Petition No. 1E1039  
Hydrogen Cyanide

To: William H. Morgan  
Division of Regulations & Petitions Control  
BF-320  
Food and Drug Administration

In reply to your memorandum of November 4, 1970, we have no objection to the proposal to reduce certain tolerances for residues of hydrogen cyanide.

/s/  
Charles L. Smith  
Head, Petitions  
Control Section

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